

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MEEHANCOMBS GLOBAL CREDIT  
OPPORTUNITIES MASTER FUND, LP, *et al.*

Plaintiffs,

v.

CAESARS ENTERTAINMENT CORPORATION and  
CAESARS ENTERTAINMENT OPERATING  
COMPANY, INC.,

Defendants.

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No. 14 Civ. 07091 (SAS)

**[PROPOSED]  
ORDER**

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FREDERICK BARTON DANNER, Individually and  
on behalf of all others similarly situated,

Plaintiff,

v.

CAESARS ENTERTAINMENT CORPORATION and  
CAESARS ENTERTAINMENT OPERATING  
COMPANY, INC.,<sup>1</sup>

Defendants.

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No. 14 Civ. 07973 (SAS)

[Caption continued on next page]

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<sup>1</sup> While the caption of the *MeehanCombs* and *Danner* matters remain the same as in Plaintiffs' original Complaints, Caesars Entertainment Operating Company ("CEOC") is not a party to this Order as, pursuant to this Court's Order dated January 15, 2015 (D.I. 21), the Plaintiffs' Complaints against Defendant CEOC are stayed pursuant to Section 362(a) of Title 11 of the United States Code based on Chapter 11 petitions filed with respect to CEOC in both the United States Bankruptcy Courts for the District of Delaware and for the Northern District of Illinois. For the avoidance of doubt, and notwithstanding anything else stated herein, this Order shall not apply to CEOC and *is not and should not be deemed an attempt to commence or continue an action against CEOC, to collect a debt against CEOC or take any other action in violation of the automatic stay imposed by Section 362 of Title 11 of the United States Code.*

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BOKF, N.A. solely in its capacity as successor  
 Indenture Trustee for the 12.75% Second-Priority  
 Senior Secured Notes due 2018,

Plaintiff,

v.

CAESARS ENTERTAINMENT CORPORATION,

Defendant.

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No. 15 Civ. 01561 (SAS)

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UMB BANK, N.A. solely in its capacity as Indenture  
 Trustee under those certain indentures, dated as of June  
 10, 2009, governing Caesars Entertainment Operating  
 Company, Inc.’s 11.25% Notes due 2017; dated as of  
 February 14, 2012, governing Caesars Entertainment  
 Operating Company, Inc.’s 8.5% Senior Secured Notes  
 due 2020; dated August 22, 2012, governing Caesars  
 Entertainment Operating Company, Inc.’s 9% Senior  
 Secured Notes due 2020; dated February 15, 2013,  
 governing Caesars Entertainment Operating Company,  
 Inc.’s 9% Senior Secured Notes due 2020,

Plaintiff,

v.

CAESARS ENTERTAINMENT CORPORATION,

Defendant.

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No. 15 Civ. 01561 (SAS)

As a result of prior orders in the above-captioned actions (collectively, the “Actions”), including this Court’s Order of October 2, 2015 [*BOKF* ECF No. 58; *Danner* ECF No. 54; *MeehanCombs* ECF No. 62; *UMB* ECF No. 64], the fact discovery deadline in the Actions was October 13, 2015, and, in turn, Plaintiffs and Defendant (collectively, the “Parties”) are required to (i) designate experts and provide Fed. R. Civ. P. 26 reports or other disclosures within 45 days

of completion of fact discovery (*i.e.*, by November 27, 2015); (ii) provide rebuttal expert reports or other disclosures within 30 days of service of initial expert reports (*i.e.*, by December 28, 2015); and (iii) complete expert depositions, if any, within 30 days of service of rebuttal expert reports or, if none, 60 days from service of the initial expert reports (*i.e.*, by January 27, 2016) (collectively, the “Expert Discovery Deadlines”). *See* Amended Scheduling Order [*BOKF* ECF No. 21; *Danner* ECF No. 39; *MeehanCombs* ECF No. 44] at 9, ¶¶ 4(c)(i)-(iii); UMB Scheduling Order [*UMB* ECF No. 34] at 2, ¶ 2. The Parties jointly seek to extend the Expert Discovery Deadlines by approximately 3 weeks. For the reasons contained in the letter submitted on behalf of the Parties on November 5, 2015, it is hereby:

ORDERED, that the Parties shall (i) designate experts and provide Rule 26 reports by **December 18, 2015 at 5:00 p.m. EST**; (ii) designate rebuttal experts and provide rebuttal expert reports, if any, by **January 22, 2016 at 5:00 p.m. EST**; and (iii) complete expert depositions, if any, by **February 19, 2016**.

SO ORDERED

Dated: New York, New York  
November \_\_\_\_, 2015

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Hon. Shira A. Scheindlin  
U.S.D.J.